

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

LOANDEPOT.COM, LLC,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Case No.: 1:23-cv-00681-MN
	:	
MOVEMENT MORTGAGE, LLC,	:	
	:	
Defendant.	:	

**STIPULATION AND [PROPOSED] ORDER
TO EXTEND TIME FOR DEPOSITIONS AND
EXPERT-RELATED DISCOVERY AND DISPOSITIVE MOTIONS**

WHEREAS, on October 5, 2023, the Court entered an initial Scheduling Order governing, among other things, fact and expert discovery, dispositive motions, and Daubert motions (D.I. 31);

WHEREAS, on March 14, 2024, the parties stipulated to, and the Court ordered, an extension of the discovery and expert deadlines (D.I. 48);

WHEREAS, the parties are continuing to work diligently to complete all discovery in this matter, including depositions; however, the parties have pending discovery disputes, which are scheduled to be heard by Magistrate Judge Burke on July 29, 2024 (D.I. 67);

WHEREAS, the parties have agreed to further extend discovery deadlines, which in turn requires an extension of the expert disclosures and dispositive motion deadlines;

IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the Court, that the deadlines related to fact witness depositions, expert disclosures, and dispositive and *Daubert* motions shall be extended as indicated below. Because the parties continue to work diligently to complete discovery and due to the hearing on the parties' discovery disputes scheduled for July 29, 2024, good cause exists to further amend the Scheduling Order (D.I. 31, 48) as shown below. The Parties respectfully submit that the remaining deadlines for a pretrial conference on January 14,

2025 and a 9-day jury trial to commence on January 21, 2025 remain as scheduled. Pursuant to Rule 16.4 of the Local Rules, the Parties certify that they have sent a copy of this request to their respective clients.

Event	Current Deadline	Extended Deadline
Close of Fact Witness Depositions	June 11, 2024	September 30, 2024
Dispositive Motions	August 17, 2024	October 17, 2024
Plaintiff's Expert Report due; Provide Expert availability for Depositions	July 1, 2024	October 15, 2024
Defendant's Expert Disclosures to Contradict or Rebut Evidence	July 31, 2024	November 15, 2024
Plaintiff's Reply to Expert Reports	August 19, 2024	December 2, 2024
Close of Expert Discovery and <i>Daubert</i> Motions due	September 17, 2024	December 20, 2024

COLE SCHOTZ P.C.

/s/ Andrew L. Cole
Andrew L. Cole (No. 5712)
Nathaniel J. Klepser (No. 6975)
500 Delaware Avenue, Suite 1410
Wilmington, DE 19801
(302) 652-3131 (Phone)
(302) 652-3117 (Fax)
acole@coleschotz.com
nklepster@coleschotz.com

*Attorneys for Plaintiff,
loanDepot.com, LLC*

Dated: June 4, 2024

CONNOLLY GALLAGHER LLP

/s/ Lauren P. DeLuca
Lauren P. DeLuca (No. 6024)
1201 N. Market St., 20th Floor
Wilmington, DE 19801
(302) 757-7300 (Phone)
ldeluca@connollygallagher.com

*Attorneys for Defendant,
Movement Mortgage, LLC*

IT IS SO ORDERED, this _____ day of _____ 2024.

The Honorable Maryellen Noreika
United States District Judge